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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

April 14, 1993

Ms. Donna M. Searcy  
Secretary  
Federal Communications Commission  
1919 M. Street, N.W., Room 222  
Washington, D.C. 20554

Re: CC Docket No. 92-297

Dear Ms. Searcy:

This letter is in comment to the proposed Rulemaking to Amend Part 1 and Part 21 of the Commission's Rules to Redesignate the 27.5-29.5 GHZ Frequency Band and to Establish Rules and Policies for Local Multipoint Distribution Service.

Paragraph 30. The Commission proposes to license LMDS using the 487 "Basic Trading Areas" concept developed by Rand McNally in the 1992 Commercial Atlas and Marketing Guide. The Basic Trading Areas as proposed for LMDS would cover a serving area that is too large. The Metropolitan Statistical Areas ("MSAs") and Rural Services Areas ("RSAs") used for licensing cellular and other radio services are the best model for geographic area licensing and preferable to other alternatives suggested by the Commission.

Paragraph 40. A five year license term is not a sufficient amount of time to obtain the necessary financing and/or to develop a market area. A ten year term would be more appropriate.

Paragraph 50. In our analysis of applying related costs to the consumer, we believe that the current fee structure is excessive.

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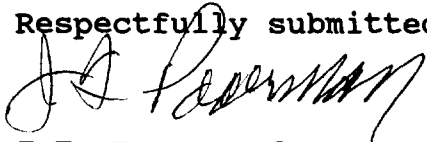
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We would like to thank the Commission for their review of our comments. If you should have any questions, please feel free to contact me at (915) 691-5454.

Respectfully submitted,



J.T. Poorman for  
Thomas & Associates

JTP/trs